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TRENTON H. NORRIS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TRENTON H. NORRIS,

Plaintiff,

v.

LOUIS E. VARELA NEVAER,

Defendant.

No. C 04-4375 SI

REVISED [PROPOSED] ORDER
GRANTING PLAINTIFF'S MOTION
FOR DEFAULT JUDGMENT AND
FOR AN AWARD OF ATTORNEYS'
FEES

Date: June 3, 2005
Time: 9:00 a.m.
Place: Courtroom 10, 19th Floor
Judge: Hon. Susan Illston

Plaintiff Trenton H. Norris' Motion For Default Judgment And For An Award of Attorneys' Fees came on regularly for hearing in this Court on June 3, 2005. The Court, having considered Plaintiff's Motion and supporting documents, the documentary evidence, the papers presented in opposition to the motion, the argument presented at the hearing, and good cause appearing, the Court HEREBY ORDERS THAT:

1. Plaintiff Trenton H. Norris' Motion For Default Judgment is **GRANTED**.
2. Plaintiff Trenton H. Norris' Motion For an Award Of Attorneys' Fees is **GRANTED**.

3. Defendants Louis E. Varela Nevaer is liable to Norris for compensatory damages in the amount of \$50,000.

4. Defendants Louis E. Varela Nevaer is liable to Norris for punitive damages in the amount of \$50,000

5. Defendant Louis E. Varela Nevaer is liable to Norris for attorneys' fees in the amount of \$159,502.

6. Defendant Louis E. Varela Nevaer is ordered to abide by terms of the following permanent injunction:

- (a) Mr. Nevaer shall not come within 100 yards of Mr. Norris or Mr. Norris' home or work address;
- (b) Mr. Nevaer shall not come within 100 yards of any person who Mr. Nevaer knows or should know is a relative, domestic partner, co-worker, client, or neighbor of Mr. Norris', or any such person's home or work address;
- (c) Mr. Nevaer shall not contact (directly, indirectly, using an alias, or using an agent) Mr. Norris in any manner (including, but not limited to, by telephone, e-mail, letter, or in person) for any purpose;
- (d) Mr. Nevaer shall not contact (directly, indirectly, using an alias, or using an agent) any relative, domestic partner, co-worker, client, or neighbor of Mr. Norris' in any manner (including, but not limited to, by telephone, e-mail, letter, or in person) for the purpose of stalking, defaming, or harassing them or Mr. Norris; and
- (e) Mr. Nevaer shall not impersonate Mr. Norris or use his identity in any way;
- (f) Mr. Nevaer shall not impersonate or use the identity of any person to in any way comment on Mr. Norris;
- (g) Mr. Nevaer shall not transmit or cause to be transmitted to any person (including but not limited to e-mail messages, oral conversations, fliers, press releases, and letters) any personal information about Mr. Norris, including but not limited to any photograph, home or work address, general location, telephone number, or any other identifying or contact information;
- (h) Mr. Nevaer shall not transmit or cause to be transmitted to any person (including but not limited to e-mail messages, oral conversations, fliers, press releases, and letters) any personal information about any relative, domestic partner, co-worker, client, or neighbor of Mr. Norris, including but not limited to any photograph, home or work address, general location, telephone number, or any other identifying or contact information;

- (i) Mr. Nevaer shall not make or publish any false statements (including falsified quotations of third parties) or misleading or defamatory statements about Mr. Norris, including but not limited to publication on the internet;
- (j) Mr. Nevaer shall not make or publish any false statements (including falsified quotations of third parties) or misleading or defamatory statements about any relative, domestic partner, co-worker, client, or neighbor of Mr. Norris', including but not limited to publication on the internet;
- (k) Mr. Nevaer shall permanently take down any existing postings regarding Mr. Norris on any website controlled by Mr. Nevaer; including but not limited to those on www.boycottsanfrancisco.com; and
- (l) Mr. Nevaer shall permanently take down any existing postings regarding any relative, domestic partner, co-worker, client, or neighbor of Mr. Norris' on any website controlled by Mr. Nevaer; including but not limited to those on www.boycottsanfrancisco.com.

IT IS SO ORDERED.

DATED: _____

